

Exhibit 1

Plaintiff's October 15, 2025 Email

Gerson, Lisa

From: Tracey O'Reilly <toreilly@milleraxline.com>
Sent: Wednesday, October 15, 2025 1:08 PM
To: Gerson, Lisa
Subject: RE: Maryland MTBE
Attachments: Burke Lukoil Affidavit (01-09-19).pdf; Burke Total Decl (12-20-18).pdf

[External Email]

Lisa,

Per our conversation today, we recently learned that Mr. Burke is no longer willing to serve as a non-site-specific expert in this matter. We are working actively to replace him but have not yet been able to retain a new expert. As we discussed, attached are copies of the declaration and affidavit previously provided by Mr. Burke in this matter related to motions to dismiss filed by Lukoil and Total. We expect the replacement expert to provide the same or similar opinions in any future expert report in this matter.

We are prepared to serve our Non-Site-Specific disclosures today, including a description of the anticipated testimony that would be provided by Mr. Burke's eventual replacement. I am, therefore, simply requesting that Defendants agree to allow Maryland up to November 12, 2025, to identify the specific expert who will be providing this testimony.

Please circulate to your group and let us know as soon as possible.

Thanks,

Tracey

Tracey O'Reilly
Miller & Axline
1050 Fulton Avenue, Suite 100
Sacramento, California 95825
Tel: 916-488-6688 x3020
Email: toreilly@milleraxline.com

From: Gerson, Lisa <LGerson@mwe.com>
Sent: Wednesday, October 15, 2025 9:05 AM
To: Tracey O'Reilly <toreilly@milleraxline.com>
Subject: RE: Maryland MTBE

I'm on the MD deposition, but can call you at the next break.

Lisa A. Gerson

Partner

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From: Tracey O'Reilly <toreilly@milleraxline.com>

Sent: Wednesday, October 15, 2025 11:47 AM

To: Gerson, Lisa <LGerson@mwe.com>

Subject: RE: Maryland MTBE

[External Email]

Good morning,

Do you have time to chat right now or in a few minutes? If so, can you call me on my cell at 916-803-2921?

Thanks,

Tracey

Tracey O'Reilly
Miller & Axline
1050 Fulton Avenue, Suite 100
Sacramento, California 95825
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Email: toreilly@milleraxline.com

From: Gerson, Lisa <LGerson@mwe.com>

Sent: Tuesday, October 14, 2025 3:14 PM

To: Tracey O'Reilly <toreilly@milleraxline.com>

Subject: RE: Maryland MTBE

Sorry Tracey, I can talk most of tomorrow.

Lisa A. Gerson

Partner

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From: Tracey O'Reilly <toreilly@milleraxline.com>
Sent: Tuesday, October 14, 2025 3:42 PM
To: Gerson, Lisa <LGerson@mwe.com>
Subject: Maryland MTBE

[External Email]

Lisa,

Do you have some time to talk about Maryland later today? I have an appointment at 1:00 PST but should be available from 2:00 PST onward.

Tracey

Tracey O'Reilly
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